

EXHIBIT 1

ATTACHMENT A

1. Between 2006 and 2009 Siddiqui exchanged emails with Samir Khan. Samir Khan became a prominent figure and member of al-Qaeda in the Arabian Peninsula (“AQAP”), a designated foreign terrorist organization. When living in the United States, Khan ran a blog called “InshallahShaheed,” (Martyr, God willing”). Khan subsequently became the editor of Jihad Recollections and its successor publication, Inspire magazine, through which AQAP disseminated propaganda and actively tried to recruit Muslims throughout the world to join cause with AQAP. Siddiqui corresponded with Khan in his capacity as editor of Jihad Recollections, enquiring about and ultimately submitting two poems for publication, and also discussed her desire to get married. Siddiqui submitted her poetry to Khan for publication in Jihad Recollections in 2009.

2. On or about November 24, 2006, Siddiqui wrote to a person whose information she got from Samir Khan, and stated that she “want[ed] to pursue Jihad in the hope of a Khilafah some day.” “Khilafah” is the Arabic term for “Caliphate,” and is related to the concept of securing an “Islamic State” governed by a fundamentalist version of Islam.

3. On or about February 13, 2009, Siddiqui wrote to Khan and explained to him that “my specialty is poetry about Islaam; ie: Jihaad, Death, etc.” [sic].

4. In or about 2009, Siddiqui wrote a poem called “Take Me to the Lands Where the Eyes Are Cooled,” which was published in Jihad Recollections. In his capacity as editor, Khan gave some direction on the content to be included in Siddiqui’s writing. Siddiqui’s poem stated “I drop bombs” and “hit cloud nine with the smell of turpentine, nations wiped clean of filthy shrines.” The poem also stated “Here—taste the Truth through fists and slit throats” and “No excuse!—to sit back and wait for the skies rain martyrdom.” In a second poem from 2009, called “The Sound of Motor,” Siddiqui wrote “All I can think of is the cue to shoot devil’s head and spurt its venom blood red.” The poem was published in front of images of gravestones and a military vehicle damaged by an explosion. The poems are attached as Exhibit A.

5. Siddiqui also wrote a letter expressing her support for Mohammad Mohamud, who was arrested on November 26, 2010, after he attempted to detonate a vehicle-borne improvised explosive device at a Christmas tree-lighting ceremony in Portland, Oregon.

Siddiqui mailed her letter to Mohamud in his jail facility soon after his arrest for that bombing plot. Siddiqui asked for “Allaah” to “accept [Mohamud’s] good deeds and sacrifices.” A copy of the letter is attached as Exhibit B.

6. Beginning in 2013, Velentzas and Siddiqui met on numerous occasions with a person who, unknown to either defendant, was an undercover law enforcement officer (the “UC”).

7. In 2013, Velentzas explained to the UC that a suicide bomber does not take her life; she gives her life in the name of Allah.

8. In 2013, Velentzas praised the attacks of September 11, 2001 and stated that being a martyr through a suicide attack guarantees entrance into heaven. Velentzas also repeatedly informed the UC that Usama bin Laden and Bin Laden’s mentor, Abdullah Azzam, are Velentzas’ heroes. Additionally, Velentzas told the UC that terrorism is based on Islamic writings found in the Qur’an, and that Bin Laden’s ideas, as manifested in his public letters, are similar to her own.

9. In or around 2013, Velentzas’s phone included as a background picture an image of Bin Laden holding an AK-47 gun. Velentzas also had a picture on her cellular phone of Yahya Ayyash. Ayyash was a bomb-maker known for building bombs used in a number of Hamas suicide attacks.

10. In or around 2013, Velentzas played for the UC an audiotape of Bin Laden speaking.

11. On or about July 10, 2014, FBI Special Agents interviewed Siddiqui at La Guardia Airport in Queens, New York. During the interview, Siddiqui falsely denied having any contact with Khan or other terrorists or terrorist groups and also falsely denied contributing to or publishing in any jihadist magazines.

12. On or about August 6, 2014, Velentzas and Siddiqui met with the UC. During their discussions Velentzas and Siddiqui talked about learning to shoot guns and learning self-defense. Velentzas told the group that her finances were what is stopping her from “learning” different things. She said that, even if the UC could help pay she would not be comfortable letting the UC do so. She then posed the question “How about science?” The UC asked what exactly Velentzas was asking. Velentzas then motioned with her hands and

used coded words to communicate that she was referring to learning how to make explosives. Velentzas said that a lot of mujahedeen have lost fingers and limbs when things go wrong while making explosives and that even if they understand science it is not as simple as one may think. Velentzas said to be careful when looking up certain You Tube videos, like ones about making explosives, because it could be a trap from the government to see who is interested in such activities and that every activity could be tracked. Velentzas said that she would contact a friend of hers about teaching them self-defense. The UC asked Siddiqui if she was still interested in learning self-defense, and Siddiqui said she would try. Siddiqui said that they should stay high in their “imaan” (“iman” is the concept of a believer’s faith in the metaphysical aspects of Islam) and continue on this path of knowledge as suggested by the Koran despite any “roadblocks.”

13. On or about August 8, 2014, Velentzas criticized the attempted bombing of the Herald Square subway station in Manhattan because the victims were “just regular people.”

14. On or about August 8, 2014, Velentzas commented on Mohamad Shnewer, who she said was “charged with quite an admirable thing . . . conspiring to attack Fort Dix in New Jersey.” In 2007, several men, including Mohamad Shnewer, conspired to stage an attack against U.S. military personnel at the Fort Dix U.S. Army base.

15. On or about September 1, 2014, Velentzas and Siddiqui discussed how to make explosions along with the attempted bombing of Times Square by Faizal Shahzad in May 2010. Specifically, Velentzas and Siddiqui discussed how they “don’t wanna be like Faisal Shahzad” where “he had a whole car...ready to go like...and that shit didn’t blow up.”

16. On or about September 7, 2014, Velentzas, Siddiqui and the UC discussed the basics of electricity and its potential use in manufacturing an explosive device. For several hours, Velentzas explained her notes on one of Siddiqui’s booklets on electrical work. In this context, Velentzas gave examples including the 1993 World Trade Center bombing, homemade grenades, pressure cooker bombs and pipe bombs. At one point, Velentzas stated that she should disassemble her phone, and then removed the battery from her cell phone. Velentzas explained that each of the bombing examples needed something to activate the bomb from a distance. Velentzas instructed the group that these were good things

to know for the sake of Allah in case anybody decided to mess with them and make them feel uncomfortable because they are Muslims.

17. On or about October 26, 2014, Velentzas, Siddiqui and the UC were involved in a discussion in which the UC stated, "That's why...like I don't wanna be, I, I'd rather be the aggressor then be the, the victim...." Velentzas responded, "We gotta know how to be both that's what I'm saying cause sometimes..." at which point the UC said "yeah." Velentzas then went on, "One fights you're the aggressor and in some fights you're not gonna be the aggressor, but you gotta remember these are the original aggressors...They are aggressors so you turn your victimhood into an aggression like a beef, you know." Shortly thereafter, Velentzas asked the UC, "You thinking about some next shit though huh?" The UC responded, "Yeah because I'm not the type of person to just like I mind my own business normally you know and I think it's kind of smart to mind your own business cause just I'm not even go up to the cops just to fuck with them there's a lot of people I think sufficient... Yeah." Velentzas then told the UC, "No, we're not talking about going out fucking with people...You understand that right? You mind your own business but those people fuck with you."

18. The same day, on October 26, 2014, Velentzas demonstrated how to stab someone without them suspecting it. Velentzas also discussed ISIS-inspired attacks, including the recent attack on the Canadian Parliament and stated that while she does not think the suicide bombings targeting train stations are honorable, she is OK with them because at the end of the day, it is a Muslim conducting the attack.

19. On or about November 2, 2014, Velentzas discussed various means of creating explosions, including by using pressure cookers. During this conversation, the UC told Velentzas that she downloaded The Anarchist Cookbook. Velentzas responded, "Oh that? When I was a kid that book right there is like... it teaches you... it basically... that's fine too because most of the things there are in your face type shit like..." When the UC said, "Yeah. And...and plus it's easier than this," Velentzas responded, "What I mean by that is... most of the stuff in there is not going to umm... it's not, it's not like the 1993 type shit, you know what I saying? Most of the shit in that book but it's not about the stuff it's about the technique." Shortly thereafter, Velentzas said that the UC should read the Anarchist's Cookbook and could print it, or "just the [pages] you think are worthwhile."

20. On or about November 20, 2014, Velentzas instructed the UC to read Inspire magazine, because it had useful information regarding car bomb explosives. Velentzas requested that the UC download a copy of Inspire magazine on her phone. During that same conversation, Velentzas stated that what the “White guy” did was easy and, when the UC asked who Velentzas was referring to, she whispered “Oklahoma.” Velentzas was referring to one of the two individuals responsible for the Oklahoma City Bombing. Later, after showing the UC a video of ISIS soldiers beheading Syrian soldiers and commenting on the “professional” manner in which they were doing the beheading, Velentzas explained that Jannah (a term meaning “paradise”) lies through the flesh of the kuffar (a term meaning “nonbelievers” or “infidels”). Velentzas then said her main purpose in this country is to spread Islam and give “dawah” (a term meaning “proselytize”). She will continue to study because the “kuffar” get to know all these things while they spread their immorality and so she should study to help spread the truth. According to Velentzas, it is the right of a Muslim to learn how to protect herself while trying to spread the truth.

21. Several days later, on November 23, 2014, Velentzas discussed portions of The Anarchist Cookbook, including a page on fertilizer bombs, and noted how it was similar to the Oklahoma City bomb. Velentzas, Siddiqui and the UC also discussed what they were ultimately trying to accomplish with their studies. Velentzas said that they do not need a plan, because plans are foiled or stopped. According to Velentzas, it was premature to discuss a plan and, when the appropriate time arises, they would know by the way of Allah. Velentzas later explained that she would never want to hurt anyone but, as a Muslim, she must acquire this knowledge and be ready. Velentzas also noted that the kufar have this knowledge and use it to hurt Muslims, and so the group needed to be prepared. Velentzas then told a story about Ayyash, the Hamas bomb-maker, taking action after a Jewish man shot Muslims in a mosque. According to Velentzas, when Allah decides the time, they will know whether one person, or two people, needs to act. She went on to state that at this juncture, they did not need to have these talks because it was too early.

22. On or about November 24, 2014, Velentzas met with the UC and again reviewed materials found in The Anarchists' Cookbook. A photograph that the UC took of Velentzas' notes from this meeting are attached as Exhibit C.

23. On or about December 21, 2014, Velentzas and the UC discussed the murder of two New York City Police Department officers that had recently occurred in Brooklyn, New York, including NYPD Officer Rafael Ramos, who had been killed sitting in his police car. Velentzas stated that the murder showed it was easy to kill a police officer.

24. On or about December 24, 2014, the UC provided a copy of the Spring 2014 issue of Inspire magazine to Velentzas, which was previously requested by Velentzas on November 20, 2014. Velentzas flipped through the pages and once she saw a page titled "Car Bombs Inside America," she started to read from that page and others. For the next several hours, Velentzas read and discussed the contents of the magazine.

25. During that same conversation on December 24, 2014, the UC mentioned the Boston Marathon bombing. Velentzas then read aloud the following from the magazine: "Choosing a place and time is a crucial factor for success in any operation. Even if the enemy...within, you will point us in general and specific targets. America, he said. Britain, France. To the field target of the kind of bomb you have...regarding the individual...event, election, campaign, festival." Velentzas then commented "See that's where Al-Qaida fucked up though like, they always pick, they always, they encourage people to pick these random places. So then you got the guy that did the thing in Boston, and the world was like, what the hell is up with that, because the people were just running in sports. You know?" The UC responded "if you wanna kill a snake you, you try to go for the head, not the, you know, not the tail." Velentzas then said "Exactly. I still believe that. The head. You go for the head, the neck, the shoulders, but not the tail."

26. On or about that same date, after the UC asked Velentzas what she thought would be the most practical way to build an explosive. Velentzas stated a practical option would be to build a nitroglycerin bomb. Prior to answering the UC's question, Velentzas had the UC place both of their phones in the kitchen and shut the kitchen door.

27. Several days later, on or about December 27, 2014, Velentzas, Siddiqui and the UC met at Velentzas' residence. Velentzas, Siddiqui and the UC discussed the steps to make an explosive device outlined in materials that they had acquired. Siddiqui stated that she "need all of us to be on the same page if we wanna do this you know, if we wanna clearly understand the steps." Velentzas stated "nitric acid is important for making nitroglycerine."

At one point, Velentzas explained that “crystals” made from a certain process “are explosive,” and that it was “the easiest thing ever.” Velentzas also explained that the size of the explosion depended on various factors, stating “it depends...the container, what else you put into it, put next to, how you light it.” At one point, while discussing the difficulties of making an explosive themselves, Velentzas stated in a joking manner “you just go buy a lot of...crazy Home Depot give me, give me 12 pack of propane.”

28. That same day, on December 27, 2014, the UC said to Velentzas and Siddiqui, “You know what’s crazy... I usually I don’t watch TV so they had the funeral for the cop, do you know how many cops were in New York City today, like 25,000 in the same spot, they were all here for the funeral. Velentzas responded “My nigger you is a thinker.” The UC said, “I’ve never seen so many cops together in one area.” Velentzas asked “where was the population in comparison to the police,” whether there were “regular people” at the funeral, and “how far away was the rest of the people.”

29. On or about February 3, 2015, the UC met with Velentzas at her residence. During that meeting, Velentzas noted her study of chemistry, that certain elements were highly reactive, and said that aluminum “gives your shit wings, that’s how reactive it is.” Later, Velentzas told the UC that she wondered what parts of a phone produces a charge, stating “a couple of things you can solder your wires to but I’m saying to myself is it for the volume when it’s gonna ring...that part, is it for the light when it lights the screen that part?” Velentzas warned the UC not to look up information about explosives on her phone, stating instead that the UC should “study the notes you have already...study them shits because they’re not complicated...they’re pretty simple so you actually know the techniques that these people are using.” Later, Velentzas asked the UC if she had listened to a lecture by Anwar al-Alwalaki, and explained that it was now “the last war, the big war in the, in the, before end of days...in English they call it Armaggedon, we’re actually living in that time, it’s not a joke it starts in Syria.” Anwar al-Alwlaki was a United States-born radical Islamic cleric and prominent leader and recruiter for AQAP, and who advised recruits on how to make bombs and carry out suicide attacks; Awlaki was killed on or about September 30, 2011.

30. During that same meeting on February 3, 2015, the UC asked Velentzas “But why are you like, you’re choosing to make that choice, like just, you’re just studying

you're not like, I get it but you're helping me or you're helping Asia but what if we can't help ourselves at the end so what, like why are you taking that chance of studying all this stuff?" Velentzas responds "To protect what you know ... Islam. Because it's not fair that somebody can, can do some fucked up shit to you or your people but you just gotta take it like that. Where under laws of nature does that happen? You know what I'm saying."

31. On or about February 22, 2015, Siddiqui, Velentzas and the UC met at Siddiqui's residence, which was located in a basement. While there, Siddiqui showed Velentzas and the UC an article she had read about three girls who traveled to Syria to join ISIS. During the discussion of the article, the UC stated "this could be us, but we old and she married." Velentzas responded "you never know, there's other ways." Later, when Siddiqui, Velentzas and the UC were leaving the residence, Velentzas noticed some items and asked "What's this, my nigga? What's this?" When the UC asked, "What is it?" Velentzas responds, "Everything." The UC repeated "Everything? What kind of everything?" Siddiqui stated, "I got everything," referencing the different bottles and canisters in view. The UC noted that Siddiqui had propane and Siddiqui responded, "I got everything up in this joint." Siddiqui then stated, "I already told you. If, if you guys want...I got everything up in this joint." They continue looking around asking what different containers were, noting cat litter, pest control chemicals and a torch. The UC stated "she got everything. This is like the Home Depot," and Velentzas responded "The Home Depot where they don't ask you why you wanna buy."

32. Around March 1, 2015, Siddiqui stated that she had a copy of the car bomb instructions from Inspire magazine. The magazine with these instructions were previously provided to Siddiqui by the UC to ultimately give to Velentzas, at Velentzas' request.

33. Between September 2014 and April 2015, the defendants took the following additional actions:

- a. Velentzas viewed on her cellular telephone a YouTube tutorial for soldering wires and circuit boards, mistakes in soldering, and introduction to "flux," a product used for soldering. Velentzas also asked another person to buy flux for her.

- b. Velentzas, Siddiqui and the UC went to Home Depot and looked at copper wires, paint containers, metal pipes, sodium chloride and heater fluid. Velentzas additionally looked at manure.
- c. Velentzas instructed the UC to print out part of The Anarchist Cookbook.
- d. Velentzas, with the help of the UC, sought out and located a bottle of potassium gluconate, which was referenced in The Anarchist Cookbook.
- e. Velentzas studied and took notes on The Anarchist Cookbook. Specifically, she reviewed and took notes on a section in The Anarchist Cookbook titled "Nitroglycerin" and explained to Siddiqui and the UC that acid needed to be kept in a container inside of a bathtub filled with ice.
- f. Velentzas used her phone to study electricity and explosions made from ammonium nitrate and nitromethane.
- g. Velentzas reviewed articles regarding Miracle Gro, a fertilizer.
- h. Velentzas showed the UC a bag of Miracle Gro and explained how it contained potassium, magnesium and ammonium nitrate. These chemicals were used in the Oklahoma City bombing.
- i. Siddiqui had a propane torch in the basement of her apartment.

34. On or about April 2, 2015, law enforcement agents executed search warrants on each of the defendants' residences. A photograph of the basement entrance to Siddiqui's residence, which was taken during this search, is attached as Exhibit D.

35. Pursuant to the April 2, 2015 search warrant, law enforcement agents observed and recovered several items, including the following:

- a. The Inspire magazine article "Car Bombs Inside America," found at Siddiqui's residence (Exhibit E)
- b. Three 400 gram propane gas tanks, found at Siddiqui's residence (Exhibit F)
- c. A soldering iron and electrical solder, found at Velentzas' residence (Exhibit G)
- d. One container of flux, found at Velentzas' residence (Exhibit H)
- e. One pressure cooker, found at Velentzas' residence (Exhibit I)
- f. One bag of fertilizer, found at Velentzas' residence (Exhibit J)
- g. Jihadist literature, found at Velentzas' residences
- h. One ~~switchblade~~², found at Siddiqui's residence (Exhibit K) *Folding knife
- i. One machete, found at Velentzas' residence (Exhibit L)
- j. Two knives, found at Velentzas' residence (Exhibit M)